

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. THOMAS AND ST. JOHN**

LAWRENCE CARTY, ET AL.,

Plaintiffs,

v.

ALBERT BRYAN, ET AL.,

Defendants.

Civil Action No. 1994-78

**Declaration of Ben Adams in Support of Defendants' Motion for Protective Order to View  
Security Surveillance Video Footage in Camera**

1. I have knowledge of the facts herein, am over 18 years of age and competent to testify to such facts.
2. I am an experienced correctional professional serving as the assistant warden of the Alexander A. Farrelly Criminal Justice Complex (CJC) on St. Thomas, U.S. Virgin Islands. I have served in this capacity since January 19, 2021. If called as a witness, I could testify to the risks associated with allowing the public to view footage from the Territory's Bureau of Corrections's (BOC) closed-circuit television system.
3. I am aware of incidents dating from October 2020 through January 2021 for which the facility has incident reports and video footage, and understand that under the terms of the 2013 Amended Consent Decree, we have an obligation to maintain and produce that information to Plaintiffs. BOC has provided Plaintiffs with reports for each of those incidents and is prepared to do the same for video footage associated with the incidents.
4. The BOC surveillance system has blind spots that prevent facility staff from capturing the identities of staff and/or inmates involved in incidents in certain locations. This footage may reveal



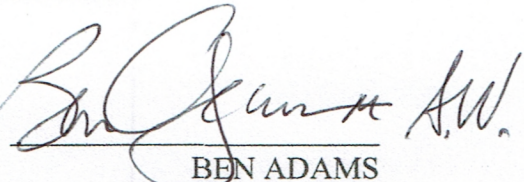


deficiencies in the security system at CJC. If shared with the public, inmates may be able to take advantage of those weaknesses.

5. In addition, video surveillance footage will depict how correctional officers responded to incidents described in those reports. Third parties may communicate the information to inmates in CJC for purposes of undermining the security and safety of everyone in the facility.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th day of March, 2021, in St. Thomas, U.S. Virgin Islands.

A handwritten signature in black ink, appearing to read "Ben Adams", is written over a horizontal line.

BEN ADAMS

Assistant Warden, Alexander A. Farrelly Criminal Justice Complex